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Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHAVONTE HILL,

Defendant.

Case No. 2:17-cr-00132-JAD-NJK

**STIPULATION FOR A
PROTECTIVE ORDER**

The parties, by and through the undersigned, respectfully request that the Court issue an Order protecting from disclosure to the public, or any third party not directly related to this case, any recordings produced by the Government during discovery under Bates stamp number PO 1 (the "Protected Material"). The parties state as follows:

1. A petition to revoke Defendant Shavonte Hill's supervised release was filed on November 25, 2020.
2. A revocation hearing is currently scheduled for January 4, 2021.
3. Under Federal Rule of Criminal Procedure 32.1(e), the government intends to produce statements of witnesses in preparation for the scheduled revocation hearing, including statements contained in Bates stamp number PO 1.

1 4. The petition in this case arises out of a traffic stop of the defendant which resulted
2 in a firearm being located in his vehicle and there are several bodycam videos of the relevant
3 events which contain statements of potential witnesses. The bodycam videos designated by Bates
4 PO 1 include personal identifying information of potential witnesses.

5 5. In order to protect the witnesses involved in and revealed by the Protected
6 Material, the parties intend to restrict access to the Protected Material in this case to the following
7 individuals: the defendant, attorneys for all parties, and any personnel that the attorneys for all
8 parties consider necessary to assist in performing that attorneys' duties in the prosecution or
9 defense of this case, including investigators, paralegals, experts, support staff, interpreters, and
10 any other individuals specifically authorized by the Court (collectively, the "Covered
11 Individuals").

12 6. Without leave of Court, the Covered Individuals shall not:

- 13 a. make copies for, or allow copies of any kind to be made by any other
14 person of the Protected Material in this case or permit dissemination of the
15 Protected Material at the Pahrump jail facility, or any other detention
16 facility where the Defendant is housed, to include leaving a copy of the
17 Protected Material at any detention facility where the Defendant is housed;
- 18 b. allow any other person to read, listen, or otherwise review the Protected
19 Material;
- 20 c. use the Protected Material for any other purpose other than preparing to
21 defend against or prosecute the charges in the indictment or any further
22 superseding indictment arising out of this case; or
- 23 d. attach the Protected Material to any of the pleadings, briefs, or other court
24 filings except to the extent those pleadings, briefs, or filings are filed under

7. Nothing in this stipulation is intended to restrict the parties' use or introduction of the Protected Material as evidence at trial or support in motion practice.

8. The parties shall inform any person to whom disclosure may be made pursuant to this order of the existence and terms of this Court's order.

9. Should a reasonable need for this protective order cease to exist, on grounds other than a Covered Individual or some other person violating or circumventing its terms, the government will move expeditiously for its dissolution.

10. The defense hereby stipulates to this protective order.

Respectfully submitted,
For the United States:

NICHOLAS A. TRUTANICH
United States Attorney

/s/


CHRISTOPHER BURTON
Assistant United States Attorney

For the Defense:

/s/

 ANDREW LEAVITT, ESQ.
 Attorney for SHAVONTE HILL

IT IS SO ORDERED:


NANCY J. KOPPE
United States Magistrate Judge

December 15, 2020

Date